

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

*IN RE: NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION*

MDL No. 2419
Master Docket No. 1:13-md-2419-FDS

**PLAINTIFFS' RESPONSE TO
GREENSPRING SURGERY CENTER'S
OBJECTIONS TO AND MOTION TO
QUASH PLAINTIFFS' STEERING
COMMITTEE'S SUBPOENA, NOTICE,
AND DOCUMENT REQUESTS**

THIS DOCUMENT RELATES TO:

All Actions.

Plaintiffs in the above-captioned matter, by and through undersigned counsel, hereby respectfully join and adopt the arguments set forth in the Plaintiffs' Steering Committee's Consolidated Response to Subpoena Objections (Dkt. No. 325) ("Consolidated Response") in response to Greenspring Surgery Center's Objections to and Motion to Quash Plaintiffs' Steering Committee's Subpoena, Notice, and Document Requests. *See* Dkt No. 303. Because the arguments made by Greenspring are identical to those addressed in the Consolidated Response, Plaintiffs join and adopt those arguments and do not inefficiently re-state them here. For the reasons set forth in the Consolidated Response, Plaintiffs respectfully request that the Court over-rule Greenspring Surgery Center's Objections to Plaintiffs' Steering Committee's Subpoena, Notice, and Document Requests and deny the Motion to Quash.

Dated: July 17, 2013

Respectfully Submitted,

PLAINTIFFS,

/s/ Kimberly A. Dougherty

Robert K. Jenner (Maryland) *Pro Hac Vice to Be Filed*

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 17th day of July, 2013, a copy of the foregoing was served via United States Mail and/or CM/ECF upon all counsel of record, including:

John T. Sly

(U.S. District Court of Maryland Bar No. 26608)

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